



**NATIONAL INDIAN GAMING COMMISSION  
TRAINING CATALOG**

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October 22, 2007

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## **PREFACE**

One of the most important aspects of any successful gaming operation is how well its employees maintain and keep up with new innovations, ideas, and changes in technology. One way to assist them in doing this is through training. The National Indian Gaming Commission (NIGC) provides training to the Indian gaming industry, regulators, and other stakeholders. It is the goal of this training to continuously improve the standards of operations, regulation and compliance with the Indian Gaming Regulatory Act (IGRA), tribal ordinances and other applicable laws and regulations. Professional training is recommended for newly hired personnel as well as for continued education of current employees. If your gaming operation has a high employee turnover rate then it is imperative to schedule periodic training in all phases of your daily operation. If your tribe has a gaming operation then training and technical assistance is highly recommended due to the continuing and rapid development of gaming machine technology. Other reasons for training are to keep up with changes to rules and regulations, continued improvements to your casino operations, and to ensure your gaming operations do not run into any non-compliance issues. We, at the NIGC can assist you in this important and worthwhile endeavor.

This catalog contains a list of training topics that can assist in your individual or your organization's professional development. The NIGC will provide any type of training you request at no cost to your tribe or commission. The instructors will be experienced personnel from the NIGC, professional trainers from the private sector, or from other federal agencies. All of the trainers will be well versed in all aspects of gaming operations or knowledgeable about their subject matter.

Please note that any topic involving legal matters such as land into trust, proprietary interest, etc., will be coordinated with the Office of General Counsel. Matters involving audits, MICS concerns, and compliance issues will be handled by the Director, Audit Division. Training for law enforcement and security personnel can be

accomplished by attendance at regional training conferences co-sponsored by the NIGC, the Indian Gaming Working Group and the Federal Bureau of Investigation.

Tribal leaders, gaming commission members, and other recipients of this catalog wishing to request training need only to make contact with the appropriate Region Director from your respective region. Details regarding the topics to be taught, date, time, location and number of persons anticipated to attend the training will be coordinated. Any other coordination needed to accomplish the scheduling of your training will be done at this time. Because coordination of training can be a time-consuming process, the Region Directors would appreciate as much advance notice as possible. If feasible, we prefer to extend participation in the training sessions to other tribes located in the same state or region.

## **SENIOR STAFF**

All Senior Staff can be contacted at NIGC Headquarters, 1441 L Street, N.W., Suite 9100, Washington, D.C., 20005, telephone (202) 632-7003, fax (202) 632-7066.

Chief of Staff	Joseph M. Valandra
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Director of Congressional Affairs	Shawn Pensoneau
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Office of General Counsel	Penny J. Coleman
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Director of Administration	Kelly Esseesy
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Director of Audits	Joe Smith
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Director of Contracts	Elaine Trimble-Saiz
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Director of Enforcement	Cesar Valdez
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## **REGION DIRECTORS**

### **Region I – Portland**

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### **Region II – Sacramento**

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### **Region III – Phoenix**

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Security Title Plaza  
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### **Region IV – St. Paul**

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### **Region V – Tulsa**

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### **Region VI – Washington, D.C.**

Cindy Altimus, Region Director  
1441 L Street, N.W., Suite 9100  
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## INTRODUCTION

This training catalog contains a list of training courses the National Indian Gaming Commission (NIGC) currently provides. This training is available to tribal leaders, tribal gaming commissions, regulatory or compliance officials, or anyone selected by your tribe to attend. The instructors will be a cadre within the NIGC who are experienced and knowledgeable in regard to the subject matter they are to teach. Their experience and knowledge has been obtained through day-to-day interaction with compliance and regulatory issues.

Training topics are divided by NIGC divisions: Enforcement, Audits, Contracts and the Office of General Counsel. If you have a training request that is not listed, please contact the Region Director of your region to discuss and coordinate.

The training topics listed in this catalog are not by any means all inclusive. Therefore, we would like to hear from you concerning any type of training you desire. See **Appendix A** for submission of your Training Request by letter to the Region Director in your region. With this catalog, the Chairman, Commissioners, and the Staff of the National Indian Gaming Commission hope to provide your tribe the opportunity to improve your gaming operations.

For further information or announcements on training not listed in this catalog please visit the NIGC website at [www.nigc.gov](http://www.nigc.gov).

## APPENDIX A

Date:

To: Region Director, Region \_\_\_\_\_

Address:

Subject: Request for Training

Name of Tribe \_\_\_\_\_

Name and Title of Requester \_\_\_\_\_

Contact Information

Telephone Number \_\_\_\_\_

E-mail address \_\_\_\_\_

Date(s) and Time for the Training \_\_\_\_\_

Location for Training \_\_\_\_\_

Number of Days Needed for Training \_\_\_\_\_

Course Title from Catalog Requested \_\_\_\_\_

\_\_\_\_\_

Who will attend, i.e. regulators, newly appointed commissioners, etc. \_\_\_\_\_

\_\_\_\_\_

Number of Persons to Attend the Training \_\_\_\_\_

**ENFORCEMENT DIVISION**

**CESAR VALDEZ, JR.**  
**DIRECTOR**

## **An Introduction to the National Indian Gaming Commission**

This one-hour course provides an overview of the National Indian Gaming Commission, the structure of the Commission, and the responsibilities of each Division within the organization. Recommended attendees include tribal councils and civic groups.

**Instructors:** Region Senior Staff

**Frequency:** Upon Request

**Training Materials:** PowerPoint

### **Notice of Training**

**to Tribes:** Via NIGC website and soon the NIGC operated  
National Informational & Security Exchange portal

### **Tribal Background Investigations & Licensing (TBIS)**

A 4-hour course is currently being offered to gaming commissioners, background investigators and other licensing staff covering those sections of IGRA related to the background investigation and licensing processes of key employees and primary management officials. A review of the two major MOU's concerning submission of background materials to the NIGC and the dissemination of criminal history information will also be conducted. Also included are suggestions and recommendations on how to develop and maintain a secure, compliant file. Class size will vary from one to a maximum of twelve.

**Instructors:** NIGC Region Field Investigation staff. Usually only one FI is needed.

**Frequency:** As requested.

**Training Materials:** Pertinent sections of IGRA and NIGC Bulletins in hard copy  
and directions to NIGC website  
Review of the conditions described by the FBI on each CHRI  
Internal NIGC memo on preparation of cards  
Exemplar of FBI CHRI record  
Auxiliary forms utilized by the NIGC and FBI such as the CJIS  
Name Search form  
PowerPoint programs are also available

#### **Notice of Training**

**to Tribes:** Via NIGC website and soon the NIGC operated National Informational & Security Exchange portal.

### **Slot Machine Compliance (SMC)**

A four-day course which provides hands-on instruction and training designed to familiarize tribal gaming commissioners, compliance officers and other key regulatory personnel with the routine operation and compliance issues of slot machines. A gaming machine manufacturer under contract with the NIGC is providing their expert training officers as the primary instructors. The instruction will include machine overview and component identification, game operation, information resources (game certification letters, PAR sheets and service manuals), pay tables, pay table verification, logic components, game optioning, key chip procedures and hopper reconciliation.

**Instructors:** Gaming machine manufacturer employees

**Frequency:** As requested.

**Training Materials:** Eleven (11) on-site, current models of slot machines  
Manuals on each type of machine  
MICS sections pertaining to slot machines  
Surveillance video segments on slot machine crimes  
Power Point as needed by the contract personnel

#### **Notice of Training**

**to Tribes:** Via the NIGC website and the NISE. First come/first served basis

## **Vendor Licensing**

Although not an NIGC or IGRA requirement, many tribal compacts and ordinances impose a requirement to background and make suitability determinations of companies providing goods and services to tribal gaming facilities. This is a 2-hour course teaching the fundamentals of conducting due diligence on companies and their principals conducting business with tribal gaming facilities. The course will answer such questions as why backgrounds are necessary, appropriate fees, exemptions, process, who should be backgrounded, resources, renewals, and samples of investigative reports.

**Who should attend:** Commissioners, background investigators, gaming operation procurement/purchasing personnel

**Frequency:** As requested.

**Professional experience level:** No prerequisites

**Instructor:** NIGC field investigators or Commissioner

**Duration:** 2 hours

## **Tribal Gaming Commissioners – Duties and Responsibilities (TGC)**

The 8-hour, one-day course is designed to instruct gaming commissioners (and prospective commissioners) on commission duties and responsibilities including the role of ethics, auditing, internal control standards, file security, background investigation and licensing per IGRA. The course will also focus on the relationships between the commission and the tribal council, casino management, auditing staff, local criminal justice agencies and the NIGC.

Tribal Council members and other tribal government officials and casino management are highly encouraged to attend together in order for the government officials to fully understand the authority placed in the gaming commissioners and to promote successful working relationships between all entities in a tribal gaming operation.

*We recommend the course be presented to one tribe at a time due to the sensitive nature of information discussed regarding ethics and investigations. Only one commission at a time will allow a freer exchange of ideas and identification of potential problem areas.*

**Instructors:** NIGC Region Field Investigation staff. In the future we are considering including our Audit Division personnel and selecting and inviting a tribal gaming commissioner or executive director that operates a successful commission

**Frequency:** Upon Request

**Training Materials:** NIGC Model Gaming Ordinance  
IGRA Regulations associated with compliance, audits and authority  
NIGC Bulletins  
Published articles  
PowerPoint lesson plans

**Notice of Training to Tribes:** Via the NIGC website and NISE

## **The Science of Conducting Background Investigations**

A 2-hour block of instruction is presented to gaming commissioners and background investigators in a multi-tribe setting. The course will focus on the required elements of a complete investigation including the time frames for completion and submission. Resources are provided to assist the investigator or supervisor in locating relevant information and documentation. Websites are provided or shared which will facilitate the information gathering process. The multi-tribal setting is intended to encourage networking and interaction between and among those present.

**Instructors:** NIGC Region Staff

**Frequency:** As Needed or Upon Request

**Training Materials:** PowerPoint  
NIGC Bulletins and FBI Guidelines

### **Notice of Training**

**to Tribes:** Letters to the tribes or e-mail  
Postings to the NIGC website

## **Introduction to Bingo Regulation**

A 2 – 4 hour interactive presentation +designed to discuss the regulatory requirements for bingo operations. Instruction includes a differentiation between tribal commercial bingo and charitable bingo. Licensing and backgrounding issues for small bingo operations are also discussed.

**Instructors:** NIGC Region Staff

**Frequency:** Based on Need

**Training Materials:** PowerPoint

### **Notice of Training**

**to Tribes:** Letters or e-mail from the host tribe  
NIGC website

## **Basic IGRA**

A 2-hour presentation provides an overview of the Indian Gaming Regulatory Act to tribal governments, regulators and gaming employees. Critical elements of the Act are isolated and discussed with an emphasis on elements which require action on the part of the participants. Recommended attendees include tribal governments, regulators and gaming employees.

**Instructors:** NIGC Region Staff or Office of General Counsel

**Frequency:** Upon request or as needed.

**Training Materials:** PowerPoint

### **Notice of Training**

**to Tribes:** Letters to the tribes

### **Criminal Activity/Preservation of Evidence and Testifying**

This three-hour block of instruction traces the history of criminal activity in the gaming industry. The course is provided for gaming commissions, investigators and surveillance personnel and is intended to take the attendee step by step through the process of identifying criminal activity, gathering and preserving evidence and ultimately providing testimony. There is a common complaint that the judicial system is not interested in prosecuting gaming cases.

**Instructors:** NIGC Region and Office of General Counsel Staff

**Frequency:** Upon Request

**Training Materials:** PowerPoint

#### **Notice of Training**

**to Tribes:** Letters or e-mails from the host tribe  
Postings on the NIGC website

## SURVEILLANCE-PLACEMENT AND CHECKLIST

A 2-hour block of instruction presented to gaming commissioners, compliance officers, surveillance officers, surveillance managers, and operators. This instruction will review surveillance requirements in a gaming environment. The instructors will present common camera placement scenarios and encourages discussion on the proper placement of equipment to achieve the desired or required coverage. The instruction will also cover the MICS surveillance checklist.

**Instructors:** NIGC Region Staff

**Frequency:** Upon Request

**Training Materials:** PowerPoint and handouts

**Notice of Training to Tribes:** Letters to the tribes or e-mail

**AUDIT DIVISION**

**JOE H. SMITH**  
**DIRECTOR**

## **Statistical Computations and the MICS**

A 90 minute review of MICS required statistical calculations. In addition to providing instruction on the necessary steps to complete the calculations, the presenter provides a historical review of instances where calculations were not completed appropriately and losses were incurred due to criminal activity. The review includes black jack hold percentages, slot machine variance identification and investigation and theoretical hold calculations for single and multi-game machines.

**Instructors:** NIGC Region Staff and Field Auditor

**Frequency:** Upon request

**Training Materials:** PowerPoint

### **Notice of Training**

**to Tribes:** Letters to the Tribe and/or email from the host tribe  
Postings on the NIGC website

### **The MICS and Surviving a MICS Audit**

A 2 to 4 hour interactive presentation that explains a MICS audit from notification to the tribe to presentation of the results follow-up. The MICS portion of the program is primarily question and answer on any MICS related issue. To facilitate questions a slotted box with index cards is placed at the reception table where participants are encouraged to write out their questions and place them into the box so that they can be asked anonymously.

**Instructors:** NIGC Region Staff and Staff Auditor

**Frequency:** Upon Need or by request

**Training Materials:** PowerPoint and MICS checklist

#### **Notice of Training**

**to Tribes:** By specific request from a Tribe

### **Value of External and Internal Auditing**

Fraud and abuse is a significant issue in the conduct of any business, especially in the cash intensive gaming industry. Gain an understanding of why the internal and external audit functions are important to the organization and, with regard to financial audits, how the reporting requirements of SAS 112 may better satisfy your expectations. Emphasis will be on the benefits provided by the audit function.

**Who Should Attend:** Tribal Council, Gaming Commissioners, Enterprise (Gaming) Board, Gaming Operation Management and persons seeking to gain an overall appreciation for the independent auditing function.

**Professional Experience Level:** No prior gaming or accounting experience required.

**Instructors:** Auditor

**Duration:** 1-hour presentation

## **Value of Internal Control Systems**

The potential risks presented by various gaming operation processes must be periodically evaluated to ensure that the controls continue to be effective. Learn the basic goals of internal controls, which are generally defined as providing reasonable assurance that the organization is utilizing resources effectively and efficiently, financial data is reliable and there is compliance with applicable laws and regulations. Gain knowledge of actions needed to institute effective internal controls including, a brief introduction of the Committee of Supporting Organization's (COSO) integrated internal control framework. Emphasis will be on understanding the purpose of internal controls, what is necessary for the systems to be effective.

**Who Should Attend:** Gaming Commissioners, Gaming Operation Management/Controller and persons seeking to gain an overall understanding of the need for strong internal controls.

**Professional Experience Level:** No prior gaming or accounting experience required.

**Instructors:** Field Auditor

**Duration:** 1-hour presentation

### **Benefits of Agreed-Upon Procedures Engagement**

Lecture will discuss the benefits of engaging an independent Certified Public Accountant (CPA) to annually evaluate the system of internal controls. Learn the NIGC recommended scope of responsibilities of the CPA in the performance of an Agreed-Upon Procedures engagement. Suggested criteria for reliance on Internal Audit will also be discussed, as well as the difference between the Agreed-Upon Procedures report stipulated in the MICS and a management letter. Emphasis is on gaining an understanding of the nature and purpose of the independent evaluation of the gaming operation's internal control systems.

**Who Should Attend:** Tribal Council, Gaming Commissioners, Enterprise (Gaming) Board, Gaming Operation Management/Controller, Auditors and persons seeking to gain an overall understanding of how the Agreed-Upon Procedures report can benefit the gaming operation.

**Professional Experience Level:** No prior gaming or accounting experience required.

**Instructors:** Field Auditor

**Duration:** 2-hour presentation

## **Internal Audit Function**

Gain an appreciation of the role of internal audit by understanding the professional standards that guide the internal audit profession, including the NIGC internal audit guidelines. Become familiar with the independence and reporting requirements of the profession and the characteristics of an audit program and report of findings. Emphasis will be on providing guidance on what is necessary for an organization to have an effective internal audit process. Sample audit documents will be provided.

**Who Should Attend:** Internal/Compliance Auditors, Tribal Gaming Regulatory Authority accounting professionals and other persons responsible for ensuring the effective use and management of audit resources.

**Professional Experience Level:** Accountant or equivalent education/training with limited experience in the Internal Audit function.

**Instructors:** Field Auditor

**Duration:** One day presentation

### **Minimum Internal Control Standards (MICS)**

Gain an understanding of the risks associated with critical processes of a gaming environment through a discussion of the NIGC MICS. Individual MICS checklist sections will be explained in detail. Emphasis is on practical and relevant issues in auditing against the federal regulations.

**Who Should Attend:** CPA firms, Internal/Compliance Auditors and persons responsible for ensuring the effective use and management of audit resources.

**Professional Experience Level:** Accountant or equivalent education/training well experienced in gaming internal control systems.

**Instructors:** Field Auditor

**Duration:** 3 day presentation

## **Auditing Information Technology**

With advances in technologies in the gaming environment, identification of the risks associated with technological change is essential. Lecture will provide an understanding of the risks associated with information technology through an explanation of the intent of the NIGC MICS. Emphasis is on practical and relevant issues in auditing IT.

**Who Should Attend:** Internal Auditors and those responsible for ensuring the effective use and management of audit resources.

**Professional Experience Level:** Accountant or equivalent education/training well experienced in gaming internal control systems.

**Instructors:** IT Field Auditor

**Duration:** 2-hour presentation

## **NIGC Fees**

Each gaming operation under the jurisdiction of the NIGC is required to make quarterly fee payments to the NIGC. The lecture will address the calculation of the fees. Discussions will include the reconciliation of the fee payments to the audited financial statements. Emphasis is on providing practical knowledge necessary to complete the NIGC recommended *Worksheet for Computing and Reporting Annual Fees Payable to the NIGC*.

**Who Should Attend:** Gaming Operation Management/Controller and persons seeking to gain an understanding of how the NIGC fee is calculated. This training is a must for anyone charged with the responsibility of performing the computation.

**Professional Experience Level:** General understanding of accounting and experienced in completing the NIGC fee worksheet.

**Instructors:** Field Auditor

**Duration:** 2-hour presentation

## **Gaming Machine Performance Analysis**

Frauds often occur as a result of poor internal controls or management override of internal controls. Understand the purpose of and what to look for in comparing gaming machine actual hold percentages to the theoretical hold percentage. Learn how to compute the adjustment in the theoretical hold percentage for multi-game/multi-denominational machines in the gaming machine statistical report to a weighted average based upon the ratio of coin-in for each payable. Emphasis is on providing practical knowledge necessary to analyze the gaming machine monthly statistical analysis reports.

**Who Should Attend:** This training is a must for anyone charged with the responsibility of producing the gaming machine analysis reports and performing the investigation of unacceptable deviations.

**Professional Experience Level:** General understanding of accounting and experienced in the gaming machine statistical analysis process.

**Instructors:** Field Auditor

**Duration:** 4-hour presentation

## **Information Technology – Process**

In today's gaming environment there is the growing need to access information systems from anywhere at any time. Gain an understanding of the vulnerabilities associated with information technology and relevant NIGC auditing standards. Emphasis is on practical and relevant IT auditing challenges in a gaming environment.

**Who Should Attend:** Information technology professionals and persons responsible for facilitating the communication expectations between customers, vendors and employees.

**Professional Experience Level:** IT professional well-experienced in gaming IT programs and applications.

**Instructors:** IT Field Auditor

**Duration:** One day presentation

### **Minimum Bankroll Formula**

The minimum bankroll formula is intended to ensure gaming operations maintain cash or cash equivalents in an amount sufficient to satisfy obligations to their customers as incurred. The calculation of the revised NIGC minimum bankroll formula will be explained in detail. Emphasis is on providing practical knowledge necessary to complete the recommended *National Indian Gaming Commission Minimum Bankroll Verification*.

**Who Should Attend:** Gaming Operation Management/Controller and persons seeking to gain an understanding of how the minimum bankroll formula is calculated. This training is a must for anyone charged with the responsibility of performing the computations.

**Professional Experience Level:** General understanding of accounting and experienced in the management of the gaming operation's bankroll.

**Instructors:** Field Auditor

**Duration:** 1-hour presentation

## **Accounting Standards**

Training will address the computation of gross gaming revenue, which varies by revenue center and can be complex. Learn the calculation of gross gaming revenue for table games, gaming machines, and other revenue centers. The second half of the presentation will discuss administrative and accounting procedures for the purpose of effective controls over the organizations fiscal affairs.

**Who Should Attend:** Gaming Operation Management/Controller, accounting professionals and person seeking to gain an understanding of NIGC accounting standards.

**Professional Experience Level:** Accountant or equivalent education/training well experienced in accounting systems for a gaming environment.

**Instructors:** Field Auditor

**Duration:** 1 day presentation

## **Revenue Audit Function**

Gain an understanding of the benefits associated with an effective revenue audit process. Learn the responsibilities of revenue audit and how a strong revenue auditing function can detect and deter irregularities. Emphasis is on practical and relevant issues of auditing gaming documentation.

**Who Should Attend:** Gaming Commissioners, Gaming Operation Management/Controller and persons seeking to gain an overall understanding of the need for a strong revenue audit function.

**Professional Experience Level:** General understanding of accounting and experienced in the revenue audit process.

**Instructor:** Field Auditor

**Duration:** 1 day presentation

## **Overview of Title 31**

Gaming operations should maintain internal control standards for currency transaction reporting that comply with 31 CFR Part 103 and to receive resource information regarding who to contact at IRS and FinCen on the subject of specific Title 31 questions. This course will provide and discuss examples of frequent internal control weaknesses noted by the Audit Division. Included in the discussion will be suggestions on how these weaknesses can be improved. Emphasis is on receiving information and resources toward meeting Title 31 requirements in the gaming environment.

**Who Should Attend:** Gaming Commissioners, Gaming Operation Management/ Controller and persons seeking to receive information and resources needed to create a strong Title 31 program.

**Professional Experience Level:** General understanding of gaming or accounting Experience is required.

**Instructor:** Field Auditor

**Duration:** 1-hour presentation

**OFFICE OF GENERAL COUNSEL**

**PENNY J. COLEMAN**

**ACTING GENERAL COUNSEL**

**MICHAEL GROSS**

**ASSOCIATE GENERAL COUNSEL**

**GENERAL LAW**

**JO-ANN M. SHYLOSKI**

**ASSOCIATE GENERAL COUNSEL**

**LITIGATION AND ENFORCEMENT**

### **Eligibility of Land for IGRA Gaming**

A 1-2 hour course offered to gaming commissioners and tribal leaders. The course will be in two parts. The first part will explain what constitutes Indian lands under the Indian Gaming Regulatory Act (IGRA) and which Indian lands are eligible for gaming. The second part will explain the documentation necessary to prove that land qualifies for IGRA gaming. Questions from participants regarding specific situations will be addressed. The class will explain how to use prior agency Indian land opinions and federal court cases for guidance and how to request an Indian lands opinion. Maximum class size should not exceed ten persons.

**Instructors:** NIGC Office of General Counsel

**Frequency:** Upon request.

**Training Materials:** Directions to NIGC website  
PowerPoint slides in hardcopy format  
Other materials as needed when reliance upon a specific  
Indian lands exception is known in advance

#### **Notice of Training**

**to Tribes:** Via NIGC website and training manual

## **How to Identify Potential IGRA Violations**

A course to help tribal gaming commissions identify potential violations of the IGRA. This course can be tailored to fit specific needs. Topics of focus can include the following violations: Class III gaming without an approved compact; managing without an approved contract; net revenue uses, including violations of existing revenue allocation plans or net revenue allocation to members without the benefit of a revenue allocation plan; sole proprietary interest; MICS; background investigations; and audit and fee submissions. Ample time for questions.

**Instructors:** NIGC Office of General Counsel staff attorney, NIGC Field Auditors and/or NIGC Field Investigators

**Frequency:** Annually

**Length:** This course can be tailored to fit specific needs. A ½ day, full day, or two day course is offered, depending on the subject areas of interest. Please contact the Office of General Counsel to discuss.

**Training Materials:** PowerPoint slides in hardcopy format  
Sample Notices of Violation/Closure Orders  
Sample Document Requests  
Sample Subpoenas  
Sample R Contract letters

### **Notice of Training**

**to Tribes:** NIGC website, mass mailing, and training manual

## **Class II Technical Standards**

A 90 minute to 2 hour course offered to gaming commissioners and casino managers. The course will focus on the meaning and implementation of the new 25 C.F.R. Part 547, Class II technical standards. Particular attention will be paid to 1) reviewing novel terminology and mapping it to current practice, 2) reviewing the technology submission and certification process and other procedural requirement, and 3) significant technical issues and requirements. Maximum class size should not exceed forty persons.

**Instructors:** NIGC Office of General Counsel

**Frequency:** Annually or semi-annually.

**Training Materials:** 25 C.F.R. Part 547

PowerPoint slides in hardcopy format

Other materials as they become available

### **Notice of Training**

**to Tribes:** Via NIGC website and training manual

## **The Unlawful Internet Gaming Act**

A 30 to 45 minute course offered to gaming commissioners and tribal councils. The course will focus on the meaning and implementation of the new Unlawful Internet Gaming Act 31 U.S.C. Title 53, which prohibits accepting payment for unlawful Internet gaming and requires financial institutions to block prohibited payments. Particular attention will be paid to application of the Act to Indian country and to Indian gaming. Maximum class size should not exceed 30 persons.

**Instructors:** NIGC Office of General Counsel

**Frequency:** Annually or semi-annually.

**Training Materials:** 31 U.S.C. Title 53  
PowerPoint slides in hardcopy format  
Other materials as they become available

### **Notice of Training**

**to Tribes:** Via NIGC website and training manual

## **Self Regulation of Class II Gaming: Approval Requirements, Process and Benefits**

A course on the requirements for certification of self regulation of Class II gaming is currently offered to tribal gaming commissions. The course will explain the self regulation certification process, including submission requirements, criteria for obtaining a certificate, the NIGC audit that would be performed, reporting requirements, and circumstances that may cause removal of the certificate. The benefits of a certificate of self regulation will be discussed. Ample time for questions.

**Instructors:** NIGC Office of General Counsel staff attorney, NIGC Field Auditors and NIGC Field Investigators

**Frequency:** Annually

**Length:** 2-hours

**Training Materials:** PowerPoint slides in hardcopy format  
Copy of NIGC regulations, 25 C.F.R. Part 518

### **Notice of Training**

**to Tribes:** NIGC website, mass mailing, and training manual

## **Federal/State/Tribal Regulations**

A 1-2 hour course (depending on the number of speakers) offered to gaming commissioners. The course may be taught as a one hour, one speaker event or a two hour event involving a three person panel (schedules of speakers permitting). The course will focus on the role of each sovereign and how all three can coordinate most effectively on issues that concern us all. The course will deal with issues of joint jurisdiction, the roles and duties of the NIGC versus the Department of the Interior, and other concerns. Examples of coordinated efforts and suggestions for improvement will be provided. Maximum class size should not exceed 20 persons.

**Instructors:** NIGC Office of General Counsel. If a panel discussion is feasible, OGC will invite state and tribal Attorney Generals to participate as a panel discussion

**Frequency:** Annually or semi-annually.

**Training Materials:** Directions to NIGC website  
PowerPoint slides in hardcopy format  
Other materials as they become available

### **Notice of Training**

**to Tribes:** Via NIGC website and training manual

## **Game Classification**

A 4-hour course is currently being offered to gaming commissioners covering the section of IGRA and NIGC regulations related to determining whether a game qualifies as Class II. Instruction will be given in the procedures for machine certification as well as how to analyze the machine internally. Class size will vary from 12 – 20.

**Instructors:** Office of General Counsel

**Frequency:** As requested.

**Training Materials:** Pertinent sections of IGRA and NIGC regulations

### **Notice of Training**

**to Tribes:** Via NIGC website

## **Ethics**

A 1-hour course is currently being offered to gaming commissioners and commission staff. Gaming commissioners and gaming commission staff are responsible for ensuring that integrity of the tribe's gaming activity as well as the security of all gaming assets. As such, gaming commissioners and gaming commission employees should adhere to a high standard of ethical conduct. The course will focus on the various ethical issues that gaming commissioners and commission staff typically encounter such as conflicts of interest, acceptance of gifts, bribery, and maintaining gaming commission independence.

**Instructors:** Office of General Counsel

**Frequency:** Upon request

**Training Materials:** PowerPoint slides in hardcopy format

**Notice of Training**

**to Tribes:** Via NIGC website

## **Responding to Potential and Actual NIGC Enforcement Actions**

A 1 to 2 hour course offered to tribal attorneys, outside counsel, gaming commissioners, and tribal leaders covering how tribes may respond to IGRA compliance issues that may lead (or have led) to an enforcement action from the NIGC. Topics include how and by whom enforcement decisions are made at the NIGC; the various enforcement tools that the NIGC may employ to correct IGRA violations; the procedural mechanisms available to tribes to respond to each enforcement tool that NIGC may employ, including opportunities for appeal; and recommendations for reaching an amicable resolution of the enforcement action.

**Instructors:** Attorneys from the NIGC Office of General Counsel

**Frequency:** As requested.

**Training Materials:** PowerPoint slides in hard copy format  
NIGC website tour

### **Notice of Training**

**to Tribes:** Via NIGC website

## **Drafting and Submitting a Tribal Gaming Ordinance**

A 2-hour course offered to interested tribal representatives covering the various sections of IGRA and NIGC regulations as they relate to the contents and submission of a gaming ordinance for the NIGC Chairman's approval. The course offers suggestions and recommendations for avoiding potential roadblocks to approval when drafting and submitting an ordinance to the NIGC. Class size will vary from one to a maximum of 12.

**Instructors:** NIGC Office of General Counsel Staff

**Frequency:** As requested.

**Training Materials:** Pertinent sections of IGRA and NIGC regulations  
Applicable NIGC Bulletins  
NIGC Model Gaming Ordinance  
NIGC Office of General Counsel's Ordinance Review  
Checklist  
Contact information for the appropriate NIGC staff to help  
the Tribe with the ordinance process

### **Notice of Training**

**to Tribes:** Via NIGC website

## **Prerequisites to Conduct Gaming**

A one hour overview course offered to tribal councils, gaming commissioners and others seeking a basic explanation of what tribes must do before they can start gaming under the Indian Gaming Regulatory Act. It will be followed by a question and answer period designed to address participant's specific questions.

**Instructors:** NIGC Office of General Counsel and NIGC Region  
Field Investigation Staff

**Frequency:** As needed

**Training Materials:** Outline and/or PowerPoint

### **Notice of Training**

**to Tribes:** Via NIGC website  
At specific request of tribes or communities  
seeking this information

## **Management Contracts and Sole Proprietary Interest**

A 1-hour course offered to tribal officials, attorneys, gaming commissioners, and other interested parties to address what constitutes a management contract and the mandate of the Indian Gaming Regulatory Act, 25 U.S.C. §2710 (b)(2)(A), that Tribes have the sole proprietary interest in their gaming activity. Topics will include: distinguishing between a management contract and other contracts; the consequences of failing to have a management contract reviewed and approved by the NIGC Chairman; and the legal basis and understanding of proprietary interest. Class size will vary from 12 – 20.

**Instructors:** NIGC Office of General Counsel Attorneys

**Frequency:** As requested.

**Training Materials:** Pertinent sections of IGRA and NIGC regulations  
NIGC Bulletin No. 1994-5

### **Notice of Training**

**to Tribes:** Via NIGC website

### **Practical Application to Privacy Act Matters**

A 1-hour course offered to gaming commissioners, background investigators and other licensing staff covering NIGC regulations allowing for the release of information on individuals and corporations contained in the NIGC systems of records. Class size will vary from 10 – 20.

**Instructors:** Office of General Counsel, Privacy Act Officer

**Frequency:** As requested.

**Training Materials:** List of NIGC systems of records  
NIGC Routine Use Regulations  
Privacy Act

#### **Notice of Training**

**to Tribes:** Via NIGC website

### **Appeals Before the Commission**

A 1-hour course offered to gaming commissioners, management contractors, tribal officials, and any other parties who may contemplate appealing a decision on either a tribal gaming ordinance, a management contract, the issuance of a Notice of Violation, Civil Fine Assessment or an Order for Temporary Closure. This session will discuss which decisions are appealable, as well as the deadlines and substance of appeals before the Commission. Class size will vary from one to maximum of 12.

**Instructors:** Office of General Counsel Staff, typically only one attorney is needed

**Frequency:** As requested.

**Training Materials:** Sample appeals on various types of actions

#### **Notice of Training**

**to Tribes:** Via NIGC website

## **Other Gaming Laws**

A 1-hour course offered to gaming commissioners. The course will focus on the laws other than IGRA that may be relevant to or impact gaming operations. The course will outline the gaming laws and explain the provision(s) relevant to the gaming operations. Copies of the other gaming laws will be provided, either in full or in part to further the discussion.

**Instructors:** Office of General Counsel, Chief of Staff

**Frequency:** Annually.

**Training Materials:** Directions to NIGC website  
PowerPoint slides in hardcopy format  
Copies of laws or relevant provisions

### **Notice of Training**

**to Tribes:** Via NIGC website

**CONTRACTS DIVISION  
ELAINE TRIMBLE-SAIZ  
DIRECTOR**

**NATIONAL ENVIRONMENTAL POLICY ACT  
(NEPA)**

**BRADLEY A. MEHAFFEY  
NEPA COMPLIANCE OFFICER**

**JOHN MANIS  
CHIEF, FINANCIAL BACKGROUNDS**

## **Management Contract Requirements**

A 1-2 hour course that is currently being offered to tribal officials, tribal gaming commissioners, management contractors, their attorneys and lenders. The course provides technical guidance and training on compliance with NIGC Regulations for submission of management contracts and amendments, 25 C.F.R. Parts 533 and 535, and the content requirements, 25 C.F.R. Part 531. Class size 10-20, meetings are usually specific to one tribe or contractor. Class can be modified for regional workshops when needed or requested.

**Instructors:** NIGC Contracts Division Staff

**Frequency:** Depends on requests, usually monthly.

**Training Materials:** NIGC Regulations  
NIGC Checklists,  
IGRA and previously approved redacted management contracts

### **Notice of Training**

**to Tribes:** Via email and/or website

## **Management Contractor Background Investigations**

A 1-hour class on compliance with IGRA and NIGC requirements for background investigations on persons and entities with a financial interest in, or management responsibility for a gaming management contract. Compliance with 25 C.F.R. Parts 533 and 537. Class size 5-15, meetings are usually specific to one tribe and one contractor. Class can be modified for regional workshops when needed.

**Instructors:** NIGC Contract Division Staff

**Frequency:** Depends on requests, usually monthly.

**Training Materials:** NIGC Regulations  
NIGC Checklists  
IGRA and NIGC Background Investigation Applications

**Notice of Training  
to Tribes:** Via email and/or website

## **National Environmental Policy Act (NEPA) Basics**

An 8-hour course is offered to tribal representatives, management company personnel, and environmental consultants that will cover the many roles and responsibilities as they relate to preparation of NEPA documents for the National Indian Gaming Commission (NIGC). It will cover the NEPA statute, the Council on Environmental Quality (CEQ) regulations, and NIGC NEPA guidance. It will explain how the requirements of other environmental laws are complied with and incorporated into the NEPA process. Class size 12-20.

**Instructor:** NIGC NEPA Compliance Officer

**Frequency:** Course will be scheduled once 12 students within a geographic region have been identified.

**Training Materials:** PowerPoint Presentation, a course workbook that will contain  
PowerPoint slides and reference materials  
Excerpts from previously prepared NEPA documents

### **Notice of Training**

**to Tribes:** Via NIGC website

## **Environmental, Public Health, and Safety (EPHS)**

A 90 minute presentation which focuses on a common sense approach to environmental public health and safety issues. The presenter outlines and discusses the scope of this agency's authority and reviews portions of the EPHS checklist(s) citing real life examples of safety violations that may pose an imminent threat to either patrons or employees. Emergency preparedness and evacuation procedures are discussed at length. The presentation is suitable for regulators, managers, tribal officials, and tribal environmental, public health, and safety staff.

**Instructors:** Region Staff, NIGC EPHS Program Manager, or an expert in in this field.

**Frequency:** Upon request or upon need

**Training Materials:** PowerPoint

### **Notice of Training**

**to Tribes:** Letters to Tribes